

David E. Patton  
*Executive Director*

*Southern District of New York*  
Jennifer L. Brown  
*Attorney-in-Charge*

July 13, 2023

**VIA ECF**

Honorable J. Paul Oetken  
United States District Judge  
Southern District of New York  
United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: USA v. Hernandez Yaneris  
22 Cr. 439 (JPO)**

Honorable Judge Oetken:

With the consent of the Pretrial Services Agency, I write to respectfully request that the Court modify Ms. Hernandez's bail conditions. Specifically, I request that the Court allow Ms. Hernandez to travel to the Eastern District of Pennsylvania on July 19, 2023, to take her children to Sesame Place Theme Park and Water Park, located in Bucks County, Pennsylvania (1.5-2 hours from New York City).

On November 16, 2021, Ms. Hernandez was released on her own recognizance. Magistrate Judge Lehrburger endorsed a bail modification request for Ms. Hernandez to travel to New Jersey on January 3, 2022. Magistrate Judge Aaron endorsed a bail modification request for Ms. Hernandez to travel to Florida on November 24, 2021. Magistrate Judge Debra Freeman endorsed a bail modification request for Ms. Hernandez to travel to New Jersey on November 30, 2021. Magistrate Judge Lehrburger endorsed a bail modification to allow Ms. Hernandez to travel freely to the Southern District of Florida on March 14, 2022. Magistrate Judge Lehrburger endorsed another bail modification request for Ms. Hernandez to travel to Connecticut on May 27, 2022. Ms. Hernandez has been fully compliant with her conditions of release and has abided by the terms of every bail modification. A trip to Sesame Place would allow Ms. Hernandez to spend important quality time with her two young children in advance of her sentencing hearing.

As noted above, we have been in touch with Pretrial Officer Taelor Nisbeth and AUSA Kevin Mead. Pretrial has no objection to this request and the Government takes no position.

Thank you for your consideration of this matter.

Respectfully submitted,

Zawadi Baharanyi  
Assistant Federal Defender  
917-612-2753

**SO ORDERED:**

  
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J. PAUL OETKEN  
United States District Judge

cc: AUSA Kevin Mead

7/14/2023